



Taylor Shellfish Company
Shoreline Substantial Development Permit: SHR2023-00003
Monitoring Measures

Below are a set of monitoring measures that Taylor Shellfish plans to undertake with respect to its proposal to install and operate a floating oyster bag system in Oakland Bay under project number SHR2023-00003. These measures include (A) conservation measures from the programmatic consultation for shellfish farming activities in Washington State inland marine waters; (B) anticipated monitoring requirements associated with the lease that may be granted for the project by the Department of Natural Resources; and (C) practices from the company's Environmental Codes of Practice. Taylor Shellfish is comfortable with the following monitoring requirements being applied as direct conditions of approval for the project's shoreline substantial development permit.

A. Programmatic Consultation Conservation Measures Requiring Surveying or Monitoring

- If conducting 1) mechanical dredge harvesting, 2) raking, 3) harrowing, 4) tilling, leveling or other bed preparation activities, 5) frosting or applying gravel or shell on beds, or 6) removing equipment or material (nets, tubes, bags) within a documented or potential spawning area for Pacific herring (*Clupea pallasii*) outside the approved work window, the work area shall be surveyed for the presence of herring spawn prior to the activity occurring. Vegetation, substrate, and materials (nets, tubes, etc.) shall be inspected. If herring spawn is present, these activities are prohibited in the areas where spawning has occurred until such time as the eggs have hatched and herring spawn is no longer present. A record shall be maintained of spawn surveys including the date and time of surveys; the area, materials, and equipment surveyed; results of the survey, etc. The Corps and the Services shall be notified if spawn is detected during a survey. The record of spawn surveys shall be made available upon request to the Corps and the Services. [Conservation Measure 9]
- For 'new' activities only, activities occurring in or adjacent to potential spawning habitat for sand lance, or surf smelt shall have a spawn survey completed in the work area by an approved biologist prior to undertaking bed preparation, maintenance, and harvest activities if work will occur outside approved work windows for these species. If eggs are present, these activities are prohibited in the areas where spawning has occurred until such time as the eggs have hatched and spawn is no longer present. If eggs are not present, work can occur for two weeks. After two weeks, a new forage fish spawn survey shall be completed if still outside the approved work windows. A record shall be maintained of spawn surveys including the date and time of surveys; the area, materials, and equipment surveyed; results of the survey, etc. The Corps and the Services shall be notified if spawn is detected during a survey. The record of spawn surveys shall be made available upon request to the Corps and the Services. [Conservation Measure 10]
- For boats and other gas-powered vehicles or power equipment that cannot be fueled in a staging area 150 feet away from a waterbody or at a fuel dock, fuels shall be transferred in Environmental Protection Agency (EPA)-compliant portable fuel containers during



refilling. A polypropylene pad or other appropriate spill protection and a funnel or spill-proof spout shall be used when refueling to prevent possible contamination of waters. A spill kit shall be available and used in the event of a spill. All spills shall be reported to the Washington Emergency Management Office at (800) 258-5990. All waste oil or other clean-up materials contaminated with petroleum products will be properly disposed of off-site. [Conservation Measure 15]

- All vehicles operated within 150 feet of any stream, waterbody, or wetland shall be inspected daily for fluid leaks before leaving the vehicle staging area. Any leaks detected shall be repaired in the vehicle staging area before the vehicle resumes operation and the leak and repair documented in a record that is available for review on request by the Corps and Services. [Conservation Measure 16]
- At least once every three months, beaches in the project vicinity will be patrolled by crews who will retrieve debris (e.g., anti-predator nets, bags, stakes, disks, tubes) that escape from the project area. Within the project vicinity, locations will be identified where debris tends to accumulate due to wave, current, or wind action, and after weather events these locations shall be patrolled by crews who will remove and dispose of shellfish related debris appropriately. A record shall be maintained with the following information and the record will be made available upon request to the Corps, NMFS, and USFWS: date of patrol, location of areas patrolled, description of the type and amount of retrieved debris, other pertinent information. [Conservation Measure 22]
- When performing other activities on-site, the grower shall routinely inspect for and document any fish or wildlife found entangled in nets or other shellfish equipment. In the event that fish, bird, or mammal is found entangled, the grower shall: 1) provide immediate notice (within 24 hours) to WDFW (all species), USFWS/NMFS (all species) or Marine Mammal Stranding Network (marine mammals), 2) attempt to release the individual(s) without harm, and 3) provide a written and photographic record of the event, including dates, species identification, number of individuals, and final disposition, to the Corps and Services. Contact the U.S. Fish and Wildlife Service Law Enforcement Office at (425) 883-8122 with any questions about the preservation of specimens. [Conservation Measure 23]

B. Anticipated Monitoring Requirements Association with DNR Lease

- If wedge anchors are used, Taylor Shellfish must conduct routine surveys to ensure that the anchors are remaining in place or relocate the anchors to their original installed position if they have moved.
- Taylor Shellfish shall maintain a record of all oyster bags installed at the project, along with the total surface coverage of project gear, and routinely monitor such gear to ensure it does not exceed authorized quantities.
- Production surveys shall be submitted to WA DNR to calculate rent and/or, to provide a tool to measure production trends within Washington waters.



C. Monitoring Measures from Taylor Shellfish's Environmental Codes of Practice

- Taylor cultivates its seed at its Quilcene Hatchery. The hatchery is a high health facility that is inspected annually by USDA APHIS vets. This inspection includes a review of biosecurity practices, animal management and a review of all pathology reports. Seed from the hatchery is then sent out to Taylor seed nurseries and the floating bags for boosting to larger sizes before they are then sent out to the farms for grow out. Oyster seed for Taylor Shellfish's Oakland Bay floating farm shall be procured from the Quilcene Hatchery.
- This farm shall have a dedicated crew assigned to its maintenance, monitoring and harvest operations. These crews will monitor the system several times each week to watch for gear wear in order to prevent debris from occurring. Debris patrols surrounding the floating farm as well as Taylor's other operations will occur every tide cycle (approximately 2 weeks) to look for displaced gear and other debris.
- Gear monitoring shall include evaluation of lines, bags and floats. Taylor shall also evaluate the site and moorings either with divers or underwater drone. If debris is found on the subtidal area, it will be removed.
- Debris patrols shall include expedient response to community concerns.
- Vessel maintenance shall be conducted regularly and recorded digitally by Taylor's maintenance crew.